

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SONRAI MEMORY LIMITED,

Plaintiff,

v.

KINGSTON TECHNOLOGY COMPANY,
INC. and KINGSTON TECHNOLOGY
CORPORATION

Defendant.

Case No. 6:21-cv-01284-ADA

**DECLARATION OF NATHANIEL STEFFENS IN SUPPORT OF
DEFENDANTS' OPPOSED MOTION TO STAY
PENDING FINAL RESOLUTION OF PLAINTIFF'S MANUFACTURER LAWSUITS**

I, Nathaniel Steffens, hereby declare as follows:

1. I am over 18 years of age and competent to make this declaration.
2. I have been employed at Kingston Technology Company, Inc. ("Kingston") since 2004. My current position is Vice President, NAND Operations. As Vice President, my responsibilities include purchasing and operations for Kingston's NAND business unit.
3. I provide this declaration on behalf of Kingston with respect to *Sonrai Memory Ltd. v. Kingston Technology Company and Kingston Technology Corporation*, Case No. 6:21-cv-01284-ADA. The statements in this declaration are based on my personal knowledge, my review of corporate records maintained by Kingston in the ordinary course of business and/or my discussions with Kingston employees. If called to testify as a witness, I could and would testify competently and truthfully to each of the statements under oath.
4. I understand, based on the complaint and its attachments, that the plaintiff has

filed a lawsuit against Kingston claiming that certain Kingston products that include SanDisk/Toshiba 64L 3D NAND flash chips infringe U.S. Patent Nos. 6,724,241 (the “’241 patent”). Plaintiff alleges that SanDisk/Toshiba 64L 3D NAND flash chips with the die identifier FRN1256G (“Accused Kioxia and Western Digital Chips”) infringe the ’241 patent.

5. I further understand, based on the complaints and attachments to the complaints, that plaintiff has filed lawsuits against Kioxia Corporation (formerly Toshiba Memory Corporation) and Kioxia America, Inc. (collectively, “Kioxia”) and Western Digital Technologies Inc. and Western Digital Corporation (“Western Digital”) of infringing the ’241 patent based on the Accused Kioxia and Western Digital Chips.

6. Kioxia supplies the Accused Kioxia and Western Digital Chips to Kingston. Kioxia is the only source of the Accused Kioxia and Western Digital Chips to Kingston.

7. Kingston does not have the ability to make any modifications to the circuits of the Accused Kioxia and Western Digital Chips accused of infringing the ’241 patent and Kingston integrates into the Kingston products the Accused Kioxia and Western Digital Chips “as is” with respect to their circuit designs.

8. Kingston does not have possession, custody, and control of the factual information and related documentation that shows the design, manufacture and operation of the accused circuitry of the Accused Kioxia and Western Digital Chips.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 21, 2021 in Fountain Valley, California.


Nathaniel Steffens